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UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

XMISSION, L.C., a Utah company,

Plaintiff,

vs.

9 FOUR ONE MEDIA, a Florida company;
ABOVE ALL OFFERS CORPORATION, an
Oregon corporation; THE AFFILIATI
NETWORK, Inc., a Florida corporation;
AGORA FINANCIAL, LLC, a Maryland
limited liability company; FLUENT, LLC a
New York limited liability company; DOES 1-
10,

Defendants.

**PLAINTIFF'S MOTION TO FILE
COMPLAINT UNDER SEAL**

Case No.: 2:18cv00182 DBP

Judge Dustin B. Pead

Plaintiff, pursuant to DUCivR 5-2 and Section 7 of the *Standard Protective Order*, moves the Court for leave to file under seal its *First Amended Complaint*. This motion is based upon the following:

1. Paragraph 10 of the Complaint contains email address domain names of XMission's customers which pursuant to XMission's Privacy Policy and responsibility to its customers should remain confidential from public disclosure.

2. The email address domains are considered confidential customer information that is not publicly known.

3. Accordingly, the information qualifies as Confidential Information pursuant to the *Standard Protective Order* that governs this case pursuant to DUCivR 26-2, and should not be disclosed to the public.

The sealed filings have been narrowly tailored to protect only the specific information requiring protection. Plaintiffs therefore request that the Court grant leave to allow Plaintiff to file its *First Amended Complaint* under seal.

DATED this 27th day of February, 2018.

DURHAM JONES & PINEGAR, P.C.

/s/ Jordan K. Cameron

Jordan K. Cameron

Attorneys for Plaintiff